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CENTRAL FAX CENTER USSN 10/815,387
Attorney Docket No. 2003-0092-01

DEC 14 2006
REMARKS

Claims 1-64 are active and pending in the present application. Claims 65-102 having been withdrawn from consideration. Claims 5-16 and 49-64 are indicated as having allowable subject matter but are objected to for depending from a rejected base claim. Claims 1-4 and 17-48 stand rejected under 35 USC §102 and claims 17-48 stand rejected under 35 USC §103. In response, Applicants provide the following remarks and solicit reconsideration and withdrawal of the rejection.

Claims 1-4 and 17-48 stand rejected under 35 USC §102 as anticipated by Tamura et al. (US 2001/0028670). Claims 17-48 also stand rejected under 35 USC §103 as unpatentable over Tamura et al. Applicants are confused by the rejection and believe that the Examiner did not intend to state claims 17-48 were rejected under 35 USC §102 because in the 35 USC §103 rejection the Examiner identifies claim features not disclosed in Tamura et al. In any event, Applicants intend the enclosed remarks to be a complete response and solicit the Examiner's assistance in overcoming any confusion on Applicants' part. Claim 1 recites "an in-chamber dust trap positioned in a region of low gas flow." (emphasis added).

The Examiner asserts that Tamura et al. identically discloses this recited claim feature. Applicants respectfully disagree with the Examiner's assertion. In Tamura et al., the hydrogen fluoride collector (28) is positioned directly adjacent the fan (3) such that the circulating air flow from the fan (3) is the strongest at the collector (28) as compared to any other region in the chamber. Furthermore, the collector (28) is oriented to extend into the circulating air flow so that air is forced through the collector (28). In other words, the collector (28) requires air to be forced through it to operate properly.

The collector (28) of Tamura et al., therefore, does not identically disclose an in-chamber dust trap positioned in a region of low gas flow as recited in claim 1. In the original specification (at page 13, lines 10-21) an explanation is provided about how the positioning of the dust trap in the boundary-layer of the air flow ensures its operation. Furthermore, the specification (at page 12, lines 18-24) also explains that dust traps which impede the circulating air flow in the chamber are undesirable and will adversely impact operation of modern lasers. Thus, applicants urge that when the phrase

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"positioned in a region of low gas flow" is interpreted by one of ordinary skill in light of the specification, it would be incorrect to conclude that the hydrogen fluoride collector of Tamura et al. identically discloses the recited dust trap of claim 1. For that reason, Applicants respectfully request reconsideration and withdrawal of the rejection 35 USC §102 of claim 1 and its dependent claims 2-4 and 17-48.

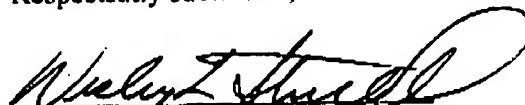
Applicants urge claims 17-48 are patentable over Tamura et al. for at least the reasons provided above. In particular, Tamura et al., do not disclose or suggest all the features recited in claims which depend from claim 1 and therefore do not provide the factual basis to establish a *prima facie* case of obviousness under 35 USC §103. In addition, these claims recite that the dust trap extend along a bottom wall or along the vertical wall. Applicants urge that Tamura et al. teach a collector positioned in direct contrast to these claims.

Tamura et al. require the collector to extend orthogonally away from the wall to ensure air can flow through the collector. Such a collector cannot operate if extending along a wall surface (either a bottom wall or a vertical wall). Thus, Applicants urge that all the features recited in claims 17-48 are not disclosed or suggested by Tamura et al. Accordingly, reconsideration and withdrawal of the rejection under 35 USC §103 of claims 17-48 are respectfully requested.

Applicants believe all claims are in condition for allowance and passage of this case to issue is respectfully requested.

Applicants do not believe that any fees or charges are due for the continuing prosecution of the above captioned U.S. Patent Application, but in the event that there are the Commissioner is hereby authorized to charge the Deposit Account of applicants' assignee, Cymer, Inc. Deposit Account No. 03-4060 for any such fees or charges.

Respectfully submitted,


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